

HACKERSTEPHENS^{LLP}

ANDREW B. STEPHENS
Partner

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Andrew@HackerStephens.com

January 6, 2022

United States District Clerk
United States District Court
205 SE 5th Avenue, Room 133
Amarillo, Texas 79101

Via FedEx

Re: **[SEALED]** *United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.*; Civil Action No. 2:21-CV-022-Z; United States District Court for the Northern District of Texas, Amarillo Division

Dear District Clerk:

In accordance with the Court's order of November 8, 2021, please issue the attached six (6) summonses to Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., in the above-referenced federal False Claims Act case.

Kindly return the summonses to my email listed above at your earliest convenience. The summonses, Complaint, the State of Texas's Notice of Election to Intervene, and the United States of America's Declination Notice will be served on Defendants after these documents are unsealed by order of the Court as proposed by the United States in their Declination Notice and Proposed Order dated November 2, 2021.

Please contact me if you have any questions or need additional information. Thank you very much for your assistance.

Sincerely,



Andrew B. Stephens

United States District Clerk
January 6, 2021
Page 2

cc (via U.S. Mail and Email):

J. Scott Hogan
Assistant United States Attorney
1100 Commerce Street, Third Floor
Dallas, Texas 75242
scott.hogan@usdoj.gov

Yolanda Y. Campbell
Attorney, Civil Division
U.S. Department of Justice
P.O. Box 261, Ben Franklin Station
Washington, DC 20044
yolanda.y.campbell@usdoj.gov

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
raymond.winter@oag.texas.gov

Halie E. Daniels
Assistant Attorney General
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
halie.daniels@oag.texas.gov

Nicholas J. Diez
Assistant Attorney General
Medicaid Fraud Control Unit
Office of Attorney General Jeff Landry
Attorney General of Louisiana
diezn@ag.louisiana.gov

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, *ex rel.* Doe, Relator,
The State of Texas, *ex rel.* Doe, Relator,
The State of Louisiana, *ex rel.* Doe, Relator,

Plaintiff(s)

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Federation of America
Office of the General Counsel
123 Williams Street
New York, New York 10038

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, *ex rel.* Doe, Relator,
The State of Texas, *ex rel.* Doe, Relator,
The State of Louisiana, *ex rel.* Doe, Relator,

Plaintiff(s)

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Gulf Coast, Inc.
Melaney Linton, Registered Agent
4600 Gulf Freeway
Houston, Texas 77023

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

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 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
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 _____ on *(date)* _____ ; or

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I declare under penalty of perjury that this information is true.

Date: _____

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UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, *ex rel.* Doe, Relator,
The State of Texas, *ex rel.* Doe, Relator,
The State of Louisiana, *ex rel.* Doe, Relator,

Plaintiff(s)

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood of Greater Texas, Inc.
Kenneth Lambrecht, Registered Agent
7424 Greenville Avenue, Suite 206
Dallas, Texas 75231

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

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 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
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My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

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Date: _____

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Server's address

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UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, *ex rel.* Doe, Relator,
The State of Texas, *ex rel.* Doe, Relator,
The State of Louisiana, *ex rel.* Doe, Relator,

Plaintiff(s)

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood South Texas, Inc.
Jeffrey Hons, Registered Agent
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

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 on *(date)* _____, and mailed a copy to the individual's last known address; or

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Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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for the

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United States of America, *ex rel.* Doe, Relator,
The State of Texas, *ex rel.* Doe, Relator,
The State of Louisiana, *ex rel.* Doe, Relator,

Plaintiff(s)

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Cameron County, Inc.
Polin C. Barraza
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

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Planned Parenthood San Antonio, Inc.,

Defendant(s)

Civil Action No. 2:21-cv-00022-Z

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To: *(Defendant's name and address)* Planned Parenthood San Antonio, Inc.
Jeffrey Hons, Registered Agent
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

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Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Road South, Suite 250
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